

Visual Compliance Screening Guidance and Procedures

What is Visual Compliance?

Export control laws prohibit us from doing business of any kind with persons or entities on lists maintained against sanctioned individuals or en

Visual Compliance Best Practices and Procedures

NOTE: If you would prefer to batch process multiple names at a time, or wish to integrate real-time RPS screening in one of your own computer applications, please contact Visual Compliance about API-integrated or Batch Processing systems. Send an email, or call 1-877-ECUSTOM (328-7866).

Individual and Company Screening

Individual and Company Screening searches the name of an individual or company against government restricted party lists. The manual entry of the names of individuals or companies and the selection of search parameters determine the results, which can vary widely depending on those selections.

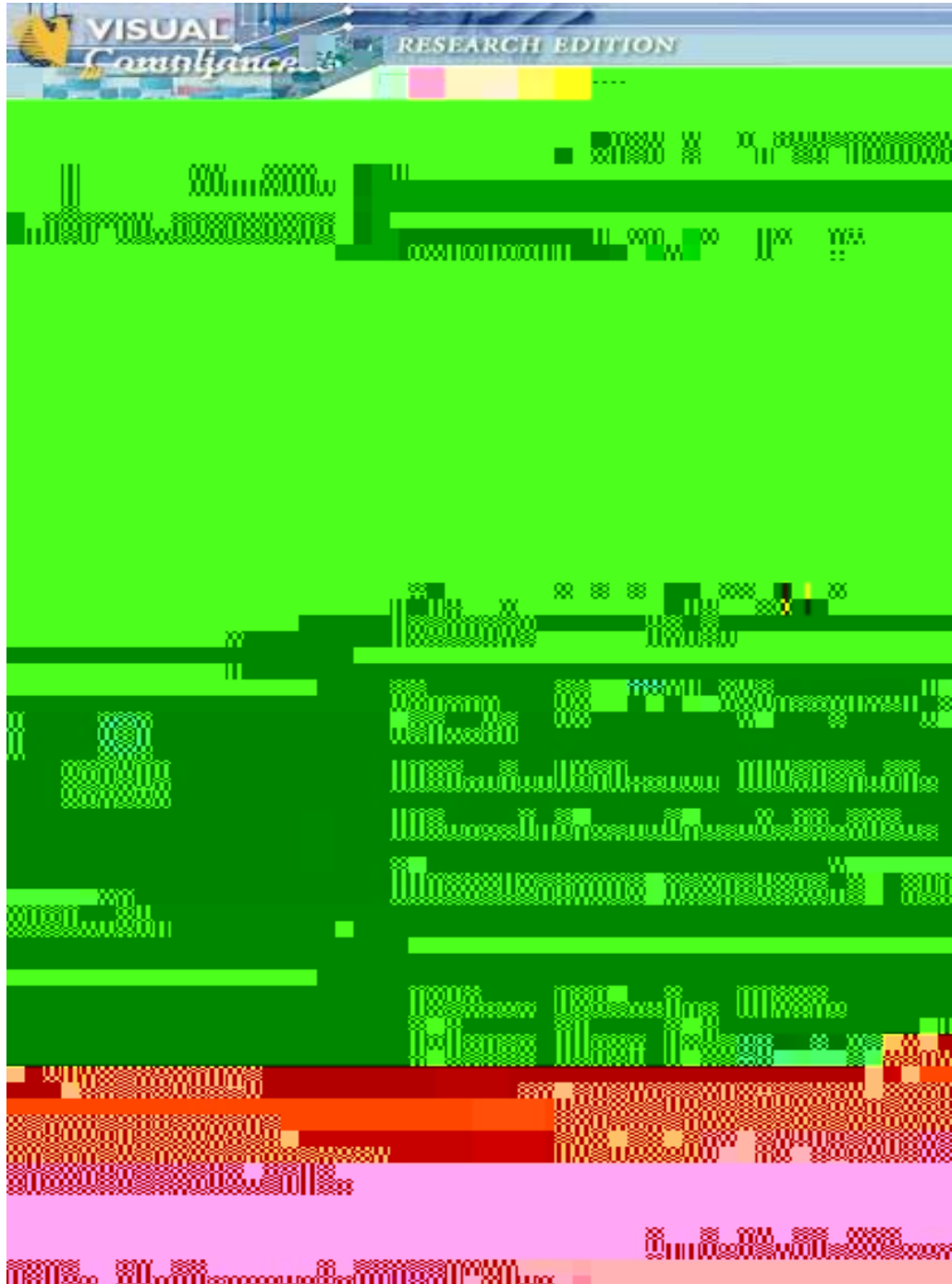
Using both the name and company fields for a search does not perform two searches at once. The company name supplied is searched first; if no match is found then the name is evaluated. If both are found in the target record, the alert is escalated.

All words entered in the respective fields are evaluated in the search. This means that if all of the words you supply do not occur in a given target record, that record will not be returned in the results, the same as in an eBay or a Google search. (An "any word" mode selection is available for EIM API screening, but usually returns excessive results.)

Example: In a search for the National Institute of Standards and Technology, you might enter the words "institute of standards." You retrieve results, including the National Institute of Standards and Technology. However, on your second try, you enter "National Institute of Compliance Standards and Science Technology." Your results do not include the National Institute of Standards and Technology (the target record) because you added the word "Compliance" in your keywords, which does not occur in the target record.

1. **Enter keywords** (name of individual or company and location information) in the form fields. Keywords are required in either the Name or Company field. The Address, City, State and Country fields are optional. When a country name is included in the search request, any risk country alerts for sanctions, embargoes, and other prohibitions and cautions are returned with the search results.

Comment: Comments or references can be added in a number of named categories. These are displayed in email reports and saved in the audit log for later reference or search.



2.

In this example, a company name and a country were entered, which produced a screening match. The destination country also returned Risk Country alerts (sanctions, embargoes, or other restrictions in force against the destination country supplied in the RPS search). Risk Country alerts are independent of screening matches and are shown whether or not a screening match is produced.

Note: Print screen shots of all of the screens used for each screening performed. Maintain these in a file so that you can refer to them to answer future questions for audits or other purposes.



Screening Results

The results screen displays the search criteria, parameters, and number of results listed at the top. The search is date and time stamped, which are important details in an audit trail. In the event of a government audit, restricted party screening results may need to be provided.

Each matching record has an MSR Reference Number that serves as a direct link to detailed information about the specific match found, including the list on which the name appears and the reason for restriction. For law enforcement lists, the detail view often includes a photo.

When applicable, the corresponding Federal Register Order is available for review in PDF format to clarify the identity of the target and the terms and conditions of the order. Opening the FR link (FRC) reveals the full text of the order. If the field is empty, it means that the U.S. government did not publish an order in th

Alert Levels

- 1** **Level 1** - A match for the Name or Company.
- 2** **Level 2** - A match of two of the four possible search elements, including the Name or Company.
- 3** **Level 3** - A match of three of the four possible search elements, including the Name or Company.
- 4** **Level 4** - A match of all four of the search elements.



After a list like this has been produced, you can click on the MSR reference number in the first row for a detail page about the individual, company, or vessel.

Email

An email utility is supplied to send the RPS screening results and relevant notes to yourself and other specified email recipients:

Whether in the main results view or the detail window:

1. Click "EMAIL THESE RESULTS" to reveal the distribution panel.
2. To send a copy of the results to yourself, select **Send to Me**.
3. Indicate additional email recipients by entering an individual address or selecting one of your distribution lists.
4. To send a copy to a group from your personal distribution list, click the "address groups" link and select the group(s).
5. Enter any *notes* you would like included in the email.
6. Select the check box if you would like your name included in the subject line of the email.

What do I do in case of a match?

Step 1. Is the “hit” or “match” against OFAC’s SDN list or targeted countries, or is it “hitting” for some other reason (i.e., “Control List” or “PEP,” “CIA,” “Non-Cooperative Countries and Territories,” “Canadian Consolidated List (OSFI),” “World Bank Debarred Parties,” “Blocked Officials File,” or “government official of a designated country”), or can you not tell what the “hit” is?

If it’s hitting against OFAC’s SDN list or targeted countries, continue to 2 below.

If it’s hitting for some other reason, you should contact the “keeper” i.e. government agency of whichever other list the match is hitting against. The Denied Persons List and the Entities List, please contact the Bureau of Industry and Security at the U.S.

Department of Commerce at 202-482-4811.

The FBI’s Most Wanted List or any other FBI-issued watch list, please contact the Federal Bureau of Investigation (<http://www.fbi.gov/contact/fo/fo.htm>).

The Debarred Parties list, please contact the Office of Defense Trade Controls at the U.S.

Step 2. Now that you've established that the hit is against OFAC's SDN list or targeted countries, you must evaluate the quality of the hit. Compare the name in your transactions with the name on the SDN list. Is the name in your transaction an individual while the name on the SDN list is a vessel, organization or company (or vice-versa)?

If yes, you do not have a valid match.*

If no, please continue to 3 below.

Step 3. How much of the SDN's name is matching against the name in your transaction? Is just one of two or more names matching (i.e., just the last name)?

If yes, you do not have a valid match.*

If no, please continue to 4 below.

Step 4. Compare the complete SDN entry with all of the information you have on the matching name in your transaction. An SDN entry often will have, for example, a full name, address, nationality, passport, tax ID or cedula number, place of birth, date of birth, former names and aliases. Are you missing a lot of this information for the name in your transaction?

If yes, go back and get more information and then compare your complete information against the SDN entry.

If no, please continue to 5 below.

Step 5. Are there a number of similarities or exact matches?

If yes, please call the OFAC Sanctions Compliance Division hotline at 1-800-540-6322.

If no, you do not have a valid match.*